

1  
2 Lisa McMahon-Myhran, WSB #27559  
3 Maya Swanes, WSB #41181  
4 Robinson Tait, P.S.  
5 710 Second Avenue, Suite 710  
6 Seattle, WA 98104  
7 Phone: 206-676-9640  
8 Fax: 206-676-9659

9  
10 UNITED STATES BANKRUPTCY COURT  
11 FOR THE WESTERN DISTRICT OF WASHINGTON  
12 AT SEATTLE

13 In Re: BANKRUPTCY NO. 08-17351-TWD  
14 JOSALYN CONLEY AND KENNETH CONLEY, CHAPTER NO. 13  
15 Debtors. STIPULATION RESOLVING MOTION FOR  
16 SANCTIONS

17 DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR SECURITIZED  
18 ASSET BACKED RECEIVABLES LLC TRUST 2007-BR4 and its successors and assigns' (hereinafter  
19 "Secured Creditor") whose loan is serviced by Rushmore Loan Management, LLC and the Debtors  
20 through their respective undersigned counsel hereto agree to entry of an Order with the following terms:

21 STIPULATED FINDINGS

- 22 1. Secured Creditor holds a lien against the parcel of real property commonly known as  
23 2020 Shattuck Ave S., Renton, WA 98005. The lien is secured by the January 22, 2007  
24 Deed of Trust recorded with the King County Recorder's office as document number  
25 200702000512, and the assignment of Deed of Trust recorded as document number  
26 20080327001981.  
27 2. Debtors' loan is contractually current through December 2013, and due for the January  
28 2014 payment.

ON THE BASIS OF THE FOREGOING STIPULATED FINDINGS, THE PARTIES AGREE  
THAT THE COURT MAY ENTER AN ORDER WITH THE FOLLOWING TERMS:

STIPULATION FOR ADEQUATE PROTECTION - 1  
60430-0002-BK-1

*Law Offices of*  
ROBINSON TAIT, P.S.  
710 Second Avenue, Suite 710  
Seattle WA 98104  
(206) 676-9640

- 1
- 2
- 3 1. The Debtor shall maintain payments directly to Secured Creditor c/o Rushmore Loan
- 4 Management Services, servicer for Secured Creditor and its successors and assigns
- 5 beginning January 1, 2014.
- 6 2. All corporate advances or expenses, corporate suspense accounts, late fees, statutory fees,
- 7 legal fees, escrow advances, or any other fees, charges, or expenses that the holder of the
- 8 mortgage loan or the master servicer, the servicer, the sub-servicer, the default servicer,
- 9 or any other entity added to the account of the Debtors, but which have not been applied
- 10 for nor approved by the Court, after proper notice and hearing and unless properly
- 11 noticed and included in a supplemental proof of claim, are forever cancelled and
- 12 discharged as of the date of the entry of this Order. Any information to the contrary that
- 13 was reported to the credit bureaus has been or will be corrected.
- 14 3. In the event that the holder of this mortgage, the current servicer or any subsequent
- 15 assignee or holder of the mortgage debt attempts to collect any of these discharged fees
- 16 or expenses, the Debtors shall have the right to pursue a proceeding before this Court for
- 17 contempt and appropriate sanctions and such other state and federal statutory remedies as
- 18 may be available to the Debtors and this Court specifically retain jurisdiction over such
- 19 claim or claims.
- 20 4. Secured Creditor agrees to reimburse \$726.10 in attorneys fees and \$235.00 in costs to
- 21 Debtors' counsel.
- 22
- 23
- 24

25 Presented by:

26 /s/ Lisa McMahon-Myhran

27 Lisa McMahon-Myhran, WSB #27559

28 Jessica Bandlow, WSB #46026

ROBINSON TAIT, P.S.

Attorneys for DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR SECURITIZED ASSET

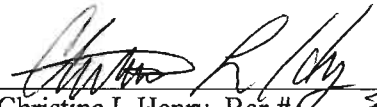
STIPULATION FOR ADEQUATE PROTECTION - 2

60430-0002-BK-1

*Law Offices of*  
**ROBINSON TAIT, P.S.**  
710 Second Avenue, Suite 710  
Seattle WA 98104  
( 2 0 6 ) 6 7 6 - 9 8 4 0

1  
2 BACKED RECEIVABLES LLC TRUST 2007-BR4 and its  
3 successors and assigns

4  
5 Agreed as to Form and Content; Notice of Presentation Waived:

6  
7   
8 Christina L Henry, Bar # 31273  
9 Attorney for Debtors  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STIPULATION FOR ADEQUATE PROTECTION - 3  
60430-0002-BK-1

Law Offices of  
ROBINSON TAIT, P.S.  
710 Second Avenue, Suite 710  
Seattle WA 98104  
(206) 478-9640